Mr. Matt Zurschmiede Hitachi Cable Indiana, Inc. 5300 Grant Line Road New Albany, IN 47150

Re: 043-11815

First Significant Permit Modification to Part 70 No.: T 043-11815-00023

Dear Mr. Zurschmiede:

Hitachi Cable Indiana, Inc. was issued a permit on April 22, 1999 for operation of the extrusion, coating, forming, curing and assembly of fluid power hoses and fitting plant. A letter requesting changes to this permit was received on January 26, 2000. Pursuant to the provisions of 326 IAC 2-7-12(d) a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the VOC and HAP rules which are applicable to the open top vapor degreaser because the solvent to area interface area was less than one (1) square meter. This change consists of deletion of 326 IAC 8-3-6 and National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14,(40 CFR Part 63.43(c), Subpart T) and it consists addition of National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14,(40 CFR Part 63.43(b), Subpart T). This modification also consists of an alternative method of calculating the daily gas usage for their Johnston Boiler(JB). Finally this modification consists of removing the duct and fan amperage record keeping records for their thermal oxidizer (CE01) because the permittee has already shown compliance with minimum capture efficiency of 90% and minimum destruction efficiency of 95% at the minimum operating temperature of 1,400 °F.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Shantanu Pahi, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Shantanu S. Pahi or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Management

Attachments: Amended Title V pages ( 9 Pages.)

Spahi

cc: File - Floyd County U.S. EPA, Region V

Floyd County Health Department

Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

# PART 70 OPERATING PERMIT and ENHANCED NEW SOURCE REVIEW OFFICE OF AIR MANAGEMENT

# Hitachi Cable Indiana, Inc. 5300 Grant Line Road New Albany, Indiana 47150

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T043-6888-00023	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: April 11, 1999

First Significant Permit Modification No.: 043-11815-00023	Pages Affected: 31, 33, 34, 35, 36, 37, 38, 39 and 40
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

First Significant Permit Modification No.: 043-11815-00023 Modified by: Spahi

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Hitachi Cable Indiana, Inc.

New Albany, Indiana

Permit Reviewer: Felicity L. Lao

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C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

#### D.1 FACILITY OPERATION CONDITIONS -

Two (2) rubber cable coating booths, each with one (1) glue applicator, identified as Glue Applicator Extruder #73.001 and Glue Applicator Extruder #73.002 and One (1) high pressure pilot line glue applicator, identified as Glue Applicator High Pressure #73.003

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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#### **Compliance Determination Requirements**

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- D.1.4 VOC Emissions

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D.1.5 Monitoring

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- D.1.6 Record Keeping Requirements [326 IAC 6-2-4]
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#### D.2 FACILITY OPERATION CONDITIONS -

One (1) natural gas fired boiler, identified as Johnston Boiler #591.026

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

#### **Compliance Determination Requirements**

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.3 Record Keeping Requirements
- D.2.4 Natural Gas Fired Boiler Certification

#### D.3 FACILITY CONDITIONS -

One (1) vapor degreaser, identified as Vapor Degreaser #351.001

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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#### Compliance Determination Requirements

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#### D.3.5 Testing Requirements [326 IAC 2-7-6(1)]

### **Compliance Monitoring Requirements**

D.3.6 Monitoring Requirements

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.3.7 Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
- D.3.8 Reporting Requirements

#### D.4 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITIES

Three (3) identical natural gas fired boilers

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM)

#### **Compliance Determination Requirement**

D.4.2 Testing Requirements [326 IAC 2-7-6(1)]

Certification Form
Emergency/Deviation Form
Natural Gas Fired Boiler Certification
Quarterly Report Form
Quarterly Compliance Monitoring Form
Semi-Annual Compliance Monitoring Form

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#### **SECTION A**

#### **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] A.1

The Permittee owns and operates a stationary operation for the extrusion, coating, forming, curing and assembly of fluid power hoses and fittings.

Responsible Official: Pat Houghlin

Source Address: 5300 Grant Line Road, New Albany, Indiana, 47150 Mailing Address: 5300 Grant Line Road, New Albany, Indiana, 47150

SIC Code: 3492, 3069 County Location: Floyd

Nonattainment for ozone County Status: Source Status: Part 70 Permit Program

Minor Source, under Emission Offset Rules;

Major Source under Section 112

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-

This stationary source consists of the following emission units and pollution control devices:

- (1) Two (2) rubber cable coating booths, each with one (1) glue applicator, identified as Glue Applicator Extruder #73.001 and Glue Applicator Extruder #73.002 respectively, each with the maximum capacity to coat either 5316 feet of vacuum hose per hour or 3150 feet of TKS return hose per hour by flowcoating method, with one (1) flameless thermal oxidizer, identified as CE01 to control VOC emissions from both booths, exhausting to one (1) stack, identified as S/V01. (Constructed in 1996)
- (2) One (1) natural gas-fired boiler, identified as Johnston Boiler #591.026, rated at 16.74 mmBtu per hour, exhausting to one (1) stack identified as S/V05. (Constructed in 1996)
- (3) One (1) vapor degreaser, identified as Vapor Degreaser #351.001, constructed in April 1990, with a daily solvent consumption rate of 4 gallons per day, with emissions controlled by means of a still, identified as CE06.
- (4) One (1) high pressure pilot line glue applicator, identified as Glue Applicator High Pressure #73.003, constructed in 1997, with the maximum capacity to coat 3125 feet of rubber hose per hour, with one (1) flameless thermal oxidizer, identified as CE01 to control VOC emissions, exhausting to one (1) stack identified as S/V01.

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A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (a) Three (3) identical natural gas-fired boilers, identified as EU02, EU03 and EU04, respectively, each rated at 3.92 mmBtu per hour. EU02 and EU03 were constructed in November 1993 and EU04 was constructed in August 1994.
- (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (3) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (5) Heat exchanger cleaning and repair.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (8) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (9) Filter or coalescer media changeout.
- (10) Other activities or categories not previously identified:

#### Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day
Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day
Volatile Organic compounds (VOC) = 3 lbs/hr or 15lbs/day

- (a) Autoclaves
- (b) Brazing furnaces
- (c) Parts washer
- (d) Product code marking

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# A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

**SECTION B** 

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**GENERAL CONDITIONS** 

# B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

#### B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in

IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

#### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

#### B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

## B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

#### B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

#### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

#### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

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(c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

### B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or for
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#### B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

#### B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM,

Hitachi Cable Indiana. Inc. First Significant Permit Modification No.: 043-11815-00023 Page 10 of 49 OP No. T043-6888-00023 Modified by: Spahi

New Albany, Indiana Permit Reviewer: Felicity L. Lao

OAM, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification:
  - (2)The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - Any insignificant activity that has been added without a permit revision; and (5)
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - A description of the items or conditions that will be inspected and the inspection (2) schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

#### B.13 Emergency Provisions [326 IAC 2-7-16]

An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

Hitachi Cable Indiana, Inc.

New Albany, Indiana

Permit Reviewer: Felicity L. Lao

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(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,

Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC

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2-7-4-(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

#### B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

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- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- The applicable requirements of the acid rain program, consistent with Section (3) 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- This permit shield is not applicable to modifications eligible for group processing until (g) after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- This permit shield is not applicable to minor Part 70 permit modifications until after (h) IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

#### B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

#### B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- A deviation is an exceedance of a permit limitation or a failure to comply with a (b) requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - Failure to implement elements of the Preventive Maintenance Plan unless lack (3) of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

# B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

#### B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

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New Albany, Indiana

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(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

## B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

#### B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

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(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

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(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

#### B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

#### B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

# B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11] Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility.

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coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

#### B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-(c) 0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

#### B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

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#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Emission Offset Minor Source Status [326 IAC 2-3]

(a) The total source potential to emit VOCs is limited to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) will not apply.

The source shall show compliance with this limit by the use of the following equation:

VOC<sub>emissions</sub> = (VOC from solvent usage) + [(input VOC to Glue Applicator Extruder #73.001, Glue Applicator Extruder #73.002 and Glue Applicator High Pressure #73.003) x (1-%control efficiency)] + input VOC to Vapor Degreaser #351.001 < 100 tpy

This limitation is based on the use of the flameless thermal oxidizer, CE01, with an overall control efficiency of 85.5% for the Glue Applicator Extruder #73.001, Glue Applicator Extruder #73.002 and Glue Applicator High Pressure #73.003.

- (b) Any change or modification which may increase potential to emit, for any other criteria pollutant other than VOCs or NOx, to 250 tons per year, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

# C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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#### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

#### C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4
and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are

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mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator,
prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to
thoroughly inspect the affected portion of the facility for the presence of asbestos. The
requirement that the inspector be accredited is federally enforceable.

#### Testing Requirements [326 IAC 2-7-6(1)]

#### C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation with five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

#### C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will continue to comply with such requirements that become effective during the term of this permit.

#### C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

## Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

#### Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] C.13

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- Said ERPs shall also identify the sources of air pollutants, the approximate amount of (e) reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date

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provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

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- (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- C.15 Compliance Monitoring Plan Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]
  - (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
    - (1) This condition;
    - (2) The Compliance Determination Requirements in Section D of this permit;
    - (3) The Compliance Monitoring Requirements in Section D of this permit;
    - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
    - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRPs shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site and is comprised of:
      - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
      - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
  - (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
  - (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
    - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was

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taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

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- (3) An automatic measurement was taken when the process was not operating; or
- (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the action values were not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]
  - (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this
    permit, the Permittee shall take appropriate corrective actions. The Permittee shall
    submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of
    receipt of the test results. The Permittee shall take appropriate action to minimize
    emissions from the affected facility while the corrective actions are being implemented.
    IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions
    taken are deficient. The Permittee shall submit a description of additional corrective
    actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.
    IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant
    stack tests.
  - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]
  - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
    - (1) Indicate actual emissions of criteria pollutants from the source;
    - (2) Indicate actual emissions of other regulated pollutants from the source.
  - (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be

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submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

#### C.18 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedure, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

#### C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;

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- (4) The analytic techniques or methods used;
- (5) The results of such analyses; and
- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - All original strip chart recordings for continuous monitoring instrumentation; (2)
  - (3) All calibration and maintenance records;

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- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps were performed in accordance with the Compliance Response Plan required by Section C-Compliance Monitoring Plan Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

## C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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#### **Stratospheric Ozone Protection**

#### C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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**FACILITY OPERATION CONDITIONS** 

**SECTION D.1** 

#### Facility Description [326 IAC 2-7-5(15)]

- (a) Two (2) rubber cable coating booths, each with one (1) glue applicator, identified as Glue Applicator Extruder #73.001 and Glue Applicator Extruder #73.002 respectively, each with the maximum capacity to coat either 5316 feet of vacuum hose per hour or 3150 feet of TKS return hose per hour by flowcoating method, with one (1) flameless thermal oxidizer, identified as CE01 to control VOC emissions from both booths, exhausting to one (1) stack, identified as S/V01. (Constructed in 1996)
- (b) One (1) high pressure pilot line glue applicator, identified as Glue Applicator High Pressure #73.003, constructed in 1997, with the maximum capacity to coat 3125 feet of rubber hose per hour, with one (1) flameless thermal oxidizer, identified as CE01 to control VOC emissions, exhausting to one (1) stack identified as S/V01.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

- (a) Pursuant to CP No. 043-4741-00023, issued on December 20, 1995, and 326 IAC 8-1-6, the BACT shall be: the thermal oxidizer, CE01, shall be in operation at all times when the two (2) glue applicators of the two (2) rubber cable coating booths, Glue Applicator Extruder #73.001 and Glue Applicator Extruder #73.002, are in operation, and maintain a minimum 95% destruction efficiency and a minimum capture efficiency of 90%.
- (b) The thermal oxidizer, CE01, shall be in operation at all times when the high pressure pilot line glue applicator, Glue Applicator High Pressure #73.003, is in operation and maintain a minimum 95% destruction efficiency and a minimum capture efficiency of 90%.

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Glue Applicator Extruder #73.001, Glue Applicator Extruder #73.002, and Glue Applicator High Pressure #73.003 and any control devices.

#### **Compliance Determination Requirements**

#### D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

(a) An initial stack test was performed on Glue Applicator Extruder #73.001 and Glue Applicator Extruder #73.002 as per CP No. 043-4741-00023, issued on December 20, 1995, operating condition 3. This test shall be repeated at least once before November 19, 2001 and repeated at least once every five (5) years from the date of this valid compliance demonstration. This test shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified or other approved methods as approved by the Commissioner.

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(b) During the period between 30 and 36 months after the issuance of this permit, the Permittee shall perform compliance stack testing for the overall control efficiency of the thermal oxidizer, CE01, controlling the VOC emissions of the high pilot line glue applicator, Glue Applicator High Pressure #73.003, regarding the VOCs. This test shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified or other approved methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.1.4 VOC Emissions

Compliance with Condition C.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.5 Monitoring

- (a) When operating, the thermal oxidizer, CE01, shall maintain a minimum operating temperature of 1,400EF in order to maintain a minimum 95% destruction efficiency and a minimum capture efficiency of 90%. After a compliance test has been performed as required by Condition D.1.3, the thermal oxidizer, CE01, shall maintain a minimum operating temperature of 1,400EF.
- (b) Compliance with the minimum temperature will be monitored by computer collected data generated continuously, and will be made available to IDEM upon request. The temperature will be averaged over 60 minute periods to determine compliance. If the average temperature for any 60 minute period is less than the established minimum temperature, this will be considered noncompliance.

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions C.1 and D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be complete and sufficient to establish compliance with Conditions C.1 and D.1.1.
  - (1) Continuous or intermittent temperature readings. Upon completion of the next Compliance Determination Test, as required in D.1.3, continuous or intermittent temperature readings.
  - (2) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (3) A log of the dates of use;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) Record of all malfunctions (any sudden unavoidable failure of the thermal oxidizer, CE01) which result in violations of the Office of Air Management rules shall be kept for a

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period of three (3) years and made available to OAM upon reguest. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAM no later than four (4) daytime business hours after the occurrence.

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(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## Reporting Requirements

A quarterly summary of the information to document compliance with Conditions C.1 and D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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**SECTION D.2** 

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]

One (1) natural gas-fired boiler, identified as Johnston Boiler #591.026, rated at 16.74 mmBtu per hour, exhausting to one (1) stack identified as S/V05.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate matter emissions from Johnston Boiler #591.026 shall not exceed 0.4562 lb/mmBtu, which was determined by the following equation:

$$Pt = 1.09$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBTU) heat input.

Total source maximum operating capacity rating in million Btu per hour (MMBTU/hr) heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

#### **Compliance Determination Requirements**

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#### D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with 326 IAC 12 (40 CFR 60.48c (g)). The owner or operator of Johnston Boiler #591.026 shall record and maintain records of the amounts of each fuel combusted during each day.
- (b) An alternative method to calculate the daily fuel consumption for the Johnston Boiler (JB) is:

Total monthly CF or Therms for Building C x estimated percentage of fuel used by the Johnston Boiler (JB) = (Total monthly gas usage for JB)/ Number of JB operating days = Average JB daily gas usage

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.4 Natural Gas Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.

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**FACILITY OPERATION CONDITIONS** 

#### Facility Description [326 IAC 2-7-5(15)]

One (1) vapor degreaser, identified as Vapor Degreaser #351.001, constructed in April 1990, with a daily solvent consumption rate of 4 gallons per day, with emissions controlled by means of a still, identified as CE06.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

#### D.3.2 Open Top Vapor Degreaser Operations and Control [326 IAC 8-3-3]

The Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip Vapor Degreaser #351.001 with a cover that can be opened and closed easily without disturbing the vapor zone.
- (2) Keep the cover closed at all times except when processing workloads through the degreaser.
- (3) Minimize solvent carry out by:
  - (a) racking parts to allow complete drainage.
  - (b) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute).
  - (c) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases.
  - (d) tipping out any pools of solvent on the cleaned parts before removal.
  - (e) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
- (4) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope.
- (5) Not occupy more than half of the degreaser's open top area with the workload.
- (6) Not load the degreaser such that the vapor level drops more than fifty (50%) of the vapor depth when the workload is removed.
- (7) Never spray above the vapor level.
- (8) Repair solvent leaks immediately, or shut down the degreaser.
- (9) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (10) Not use workplace fans near the degreaser opening.

**SECTION D.3** 

SECTION D.3

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(11) Not allow visually detectable water in the solvent exiting the water separator.

(12) Provide a permanent, conspicuous label summarizing the operating requirements.

# D.3.3 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T] This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

- (a) Pursuant to 40 CFR 63.463(a) and (b), the Permittee shall conform to the following design requirements:
  - (1) Vapor Degreaser #351.001 shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
  - (2) Vapor Degreaser #351.001 shall be employed with a control combination of: working-mode cover, freeboard refrigeration device and dwell or other equivalent methods of control as determined using the procedure in 40 CFR 63.469.
  - (3) Vapor Degreaser #351.001 shall have a freeboard ratio of 0.75 or greater.
  - (4) Vapor Degreaser #351.001 shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - (5) Vapor Degreaser #351.001 shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.
  - (6) Vapor Degreaser #351.001 shall have a primary condenser.
  - (7) Vapor Degreaser #351.001 shall be equipped with a vapor level control device that shuts off sump heat if the vapor level rises above the height of the primary condenser.
- (b) Pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the degreasing operation are applicable:
  - (1) Control air disturbances across Vapor Degreaser #351.001 opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
  - (2) The parts baskets or the parts being cleaned in Vapor Degreaser #351.001 shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
  - (3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
  - (4) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any

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solvent cleaning machine unless an equally effective approach has been approved by the commissioner.

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- (5) Parts baskets or parts shall not be removed until dripping has stopped.
- (6) During startup, the primary condenser shall be turned on before the sump heater.
- (7) During shutdown, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (8) When solvent is added or drained, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
- (10) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.
- (11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
- (12) Sponges, fabric, wood, and paper products shall not be cleaned.
- (c) Pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:
  - (1) The Permittee shall conduct monitoring of each control device used to comply with 40 CFR 63.463 as provided in 40 CFR 63.466, Monitoring Procedures.
  - (2) Determine during each monitoring period if the control devices listed in D.3.3(a)(2) meet the following requirements:
    - (A) When using a freeboard refrigeration device the Permittee shall:
      - (i) The chilled air blanket temperature (in <sup>0</sup>F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
    - (B) When using a working-mode cover the Permittee shall:
      - (i) Ensure that the cover opens only for part entrance and removal and completely covers Vapor Degreaser #351.001 openings when closed.
      - (ii) Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
    - (C) When using an idling-mode the Permittee shall:
      - (i) Ensure that the cover is in place whenever parts are not in the

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solvent cleaning machine and completely covers the cleaning machine.

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- (ii) Ensure that the idling-mode cover is maintained free of cracks, holes and other defects.
- (D) When using a dwell the Permittee shall:
  - (i) Determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, as described in 40 CFR 63.465(d)
  - (ii) Ensure that, after cleaning, each part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or the maximum dwell time determined using the most complex part type or parts basket.
- (3) An exceedance has occurred if:
  - (A) The requirements of paragraphs, (c)(2)(B)(i), (c)(2)(C)(i) and (c)(2)(D) of this condition are not met; and
  - (B) The requirements of paragraphs (c)(2)(A)(i), (c)(2)(B)(ii) and (c)(2)(C)(ii), of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits.
- (4) The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR63.468.

### D.3.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Vapor Degreaser #351.001 and any control devices.

### **Compliance Determination Requirements**

D.3.5 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63.465]

The Permittee is not required to test this facility by this permit or by 40 CFR Part 63; 40 CFR63.465 Test Methods. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

### **Compliance Monitoring Requirements**

### D.3.6 Monitoring Procedures [326 IAC 2-7-6(1)] [40 CFR 63.466]

Pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures:

- (a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified below:
  - (1) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in the idling zone.

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The Permittee shall conduct monitoring and record the results on a monthly basis for the (b) control devices, as appropriate, specified below:

- (1) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers Vapor Degreaser #351.001 openings when closed, and is free of cracks, holes, and other defects.
- (c) The Permittee shall monitor the hoist speed as described below:
  - The Permittee shall determine the hoist speed by measuring the time it takes for (1) the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
  - (2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
  - If the exceedance of the hoist speed occurs during quarterly monitoring, the (3) monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
  - (4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

### Recordkeeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19

#### Recordkeeping Requirements D.3.7

- The Permittee shall maintain, in written or electronic form, records of the following (a) information specified below, for the life time of the machine,
  - (1) Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
  - (2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that Vapor Degreaser #351.001 and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
  - (3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.
- (b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:
  - The results of control device monitoring required under 40 CFR63.466. (1)
  - (2)Information on the actions taken to comply with 40 CFR63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
  - (3) Estimates of annual solvent consumption for each solvent cleaning machine.

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The reports required in this condition used to document compliance with Conditions D.3.2 and D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (a) The initial notification report for Vapor Degreaser #351.001 required under 40 CFR 63.468(a) was submitted on August 15, 1995.
- (b) The initial statement of compliance for Vapor Degreaser #351.001 required under 40 CFR 63.468(c) was submitted on August 3, 1998.
- (c) The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:
  - (1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR63.463(d)(10)."
  - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (d) The Permittee shall submit an exceedance report using the Semiannual Compliance Monitoring Report Form provided with this permit to IDEM, OAM semiannually, except when IDEM, OAM determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or if an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calender half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:
  - (1) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
  - (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
  - (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- (e) Pursuant to 40 CFR63.463 (i), the Permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannually if the following conditions are met:
  - (1) The source has demonstrated a full year of compliance without an exceedance.
  - (2) The Permittee continues to comply with all relevant recordkeeping and

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monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T

- (3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.
- (c) The Permittee of a solvent cleaning machine requesting an equivalency determination, as described in 40 CFR63.469 shall submit an equivalency request report to the commissioner and receive an approval prior to startup.

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### SECTION D.4 FACILITY OPERATION CONDITIONS INSIGNIFICANT ACTIVITIES

### Facility Description [326 IAC 2-7-5(15)]

Three (3) identical natural gas-fired boilers, identified as EU02, EU03 and EU04, respectively, each rated at 3.92 mmBtu per hour. EU02 and EU03 were constructed in November 1993 and EU04 was constructed in August 1994.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate matter emissions from the three (3) identical boilers rated at 3.92 mmBtu/hr each, shall not exceed 0.5743 lb/mmBtu as determined by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

### **Compliance Determination Requirement**

Q =

### D.4.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

# PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Hitachi Cable Indiana, Inc.

Source Address: 5300 Grant Line Road, New Albany, Indiana 47150 Mailing Address: 5300 Grant Line Road, New Albany, Indiana 47150

Part 70 Permit No.: 043-6888-00023

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
9 Annual Compliance Certification Letter
9 Test Result (specify)
9 Report (specify)
9 Notification (specify)
9 Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
Signature:
Printed Name:
Title/Position:
Date:

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## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

### PART 70 OPERATING PERMIT EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Hitachi Cable Indiana, Inc.

Source Address: 5300 Grant Line Road, New Albany, Indiana 47150 Mailing Address: 5300 Grant Line Road, New Albany, Indiana 47150

Part 70 Permit No.: 043-6888-00023

:

### This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4)
business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days
(Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)

The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:	
Control Equipment:	
Permit Condition or Operation Limitation in Permit:	
Description of the Emergency/Deviation:	
Describe the cause of the Emergency/Deviation:	

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Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, PB, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:
Form Completed by: Title / Position: Date: Phone:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

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## PART 70 OPERATING PERMIT NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Hitachi Cable Indiana, Inc.

Source Address: 5300 Grant Line Road, New Albany, Indiana 47150 Mailing Address: 5300 Grant Line Road, New Albany, Indiana 47150

Part 70 Permit No.: 043-6888-00023

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.				
Report period Beginning: Ending:				
Alternate Fuel Days burning alternate fuel From To				
I certify under penalty of law that at all times, except as otherwise noted above, only natural gas burned in the indicated boilers during the report period. Based on my inquiry of the person or pe who manage the system, or those persons directly responsible for gathering the information information submitted is, to the best of my knowledge and belief, true, accurate, and complete.	ersons			
Signature:				
Printed Name:				
-Title/Position:				
Date:				

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

### **Part 70 Quarterly Report**

Source Name: Hitachi Cable Indiana, Inc.

Source Address: 5300 Grant Line Road, New Albany, Indiana 47150 Mailing Address: 5300 Grant Line Road, New Albany, Indiana 47150

Part 70 Permit No.: 043-6888-00023

Facility: Glue Applicator Extruder #73.001, Glue Applicator Extruder #73.002, Vapor

Hitachi Cable Indiana, Inc. New Albany, Indiana

First Significant Permit Modification No.: 043-11815-00023

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Permit Reviewer: Felicity L. Lao

Degreaser #351.001 and Glue Applicator High Pressure #73.003

Parameter: VOC

Limit: VOC output = less than 100 tons per year, rolled monthly\*

	VOC input			VOC output		
Month	This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total
Month 1						
Month 2						
Month 3						

9	No c	deviation	occurred	in	this	quarter.
---	------	-----------	----------	----	------	----------

9	s occurred in this quarter. has been reported on:	
Title		

VOC<sub>emissions</sub> = input VOC to Glue Applicator Extruder #73.001, Glue Applicator Extruder #73.002 and Glue Applicator High Pressure #73.003 \* (1-0.855)% + input VOC to Vapor Degreaser #351.001 < 100 tpy

### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT **COMPLIANCE DATA SECTION**

### **PART 70 OPERATING PERMIT QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Hitachi Cable Indiana, Inc.

Source Address: 5300 Grant Line Road, New Albany, Indiana 47150 5300 Grant Line Road, New Albany, Indiana 47150 Mailing Address:

Part 70 Permit No.: 043-6888-00023

Months:	to	Year:
141011113.	i O	i cai .

<sup>\*</sup>Based on the following equation:

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This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.					
9 THE FOLLOWING DEVIATIONS OCCURR	9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:				
Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation			
Form Completed By: Title/Position: Date: Phone:					

Attach a signed certification to complete this report.

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: Source Address: Mailing Address: Part 70 Permit N	5300 Grant 5300 Grant	Line Road, Nev	v Albany, Indiana 47150 v Albany, Indiana 47150	
Months:	to	Yea	r:	
stated in this per compliance mo pages may be a Emergency/De	ermit. This repo nitoring requirer attached if nece	rt shall be subm ments and the d ssary. This forr nce Report. If n	n can be supplemented by	deviation from the ust be reported. Additional
9 NO DEVIATI	IONS OCCURR	ED THIS REPO	RTING PERIOD.	
9 THE FOLLO	WING DEVIATI	ONS OCCURR	ED THIS REPORTING PE	RIOD:
	Monitoring Reemit Condition I		Number of Deviations	Date of each Deviation
- I	Form Completed Title/Position: Date: Phone:	i By:		

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Management

Addendum to the

Technical Support Document for Significant Permit Modification to a Part 70 Operating Permit

Source Name: Hitachi Cable Indiana, Inc.

Source Location: 5300 Grant Line Road, New Albany, Indiana 47150

County: Floyd

Sig. Permit Modification No.: 043-11815-00023 SIC Code: 043-11815-00023

Permit Reviewer: Spahi

On February 18, 2000, the Office of Air Management (OAM) had a notice published in the New Albany Tribune, New Albany, Indiana, stating that Hitachi Cable Indiana, Inc. had applied for a significant permit modification to their Part 70 operating permit. The notice also stated that OAM proposed to issue a permit for changing the company's NESHAP applicability to their vapor degreaser and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 20, 2000, Hitachi Cable Indiana, Inc. submitted comments on the proposed significant permit modification to their Part 70 operating permit. The summary of the comments and corresponding responses is as follows:

- Comment #1:
- The changes to the VOC and HAP rules for the vapor degreaser do not reflect the terms and conditions selected by HCI on the Initial Statement of Compliance filed with the department in July, 1998. A copy of the form is attached for your reference. Condition D.3.3(a)(2) should be changed to eliminate any reference to superheated vapor. This unit does not have superheated vapor capability. Instead, the control option of dwell time should be added to the list.
- Response #1:
- Condition D.3.3(a)(2) shall be updated to reflect the correct control combination used by the source to comply with the applicable NESHAP(40 CFR Part 63, Subpart T) for their vapor degreaser. Condition D.3.3(a)(2) shall be amended as follows(changes in bold):
- D.3.3 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

- (a) Pursuant to 40 CFR 63.463(a) and (b), the Permittee shall conform to the following design requirements:
  - (2) Vapor Degreaser #351.001 shall be employed with a control combination of: working-mode cover, freeboard ratio of 1.0 and superheated vapor refrigeration device and dwell or other equivalent methods of control as determined using the procedure in 40 CFR 63.469.

Comment #2: Condition D.3.3(c)(2)(C) should be deleted. It does not apply to this unit.

Response #2: Conditions D.3.3(c)(2)(C), D.3.3(c)(3)(A) and D.3.3(c)(3)(B) shall be updated to reflect the correct monitoring requirements as per the applicable NESHAP(40 CFR Part 63, Subpart T). Conditions D.3.3(c)(2)(C), D.3.3(c)(3)(A) and D.3.3(c)(3)(B) shall be amended as follows(changes in bold):

- D.3.3 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]
   This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.
  - (c) Pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:
    - (1) The Permittee shall conduct monitoring of each control device used to comply with 40 CFR 63.463 as provided in 40 CFR 63.466, Monitoring Procedures.
    - (2) Determine during each monitoring period if the control devices listed in D.3.3(a)(2) meet the following requirements:
      - (A) When using a freeboard refrigeration device the Permittee shall:
        - (1) The chilled air blanket temperature (in °F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
      - (AB) When using a working-mode cover the Permittee shall:
        - (i) Ensure that the cover opens only for part entrance and removal and completely covers Vapor Degreaser #351.001 openings when closed.
        - (ii) Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
      - (B-C) When using an idling-mode the Permittee shall:
        - (i) Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine.
        - (ii) Ensure that the idling-mode cover is maintained free of cracks, holes and other defects.
      - ( C D) When using a superheated vapor dwell the Permittee shall:
        - (i) Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 °F above the solvent's boiling point. Determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, as described in 40 CFR 63.465(d).

- (ii) Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed. Ensure that, after cleaning, each part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or the maximum dwell time determined using the most complex part type or parts basket.
- (3) An exceedance has occurred if:
  - (A) The requirements of paragraphs,  $\frac{(c)(2)(A)(i)}{(c)(2)(B)(i)}$ ,  $\frac{(c)(2)(B)(i)}{(c)(2)(C)(i)}$  and  $\frac{(c)(2)(D)}{(c)(2)(D)}$  of this condition are not met; and
  - (B) The requirements of paragraphs—(c)(2)(A)(ii), (c)(2)(B)(ii) and (c)(2)(C)(ii), (c)(2)(A)(i), (c)(2)(B)(ii) and (c)(2)(C)(ii), of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits.

# Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

### **Source Background and Description**

Source Name: Hitachi Cable Indiana, Inc.

Source Location: 5300 Grant Line Road, New Albany, Indiana 47150

 County:
 Floyd

 SIC Code:
 3492,3069

 Operation Permit No.:
 043-6888-00023

 Operation Permit Issuance Date:
 April 22, 1999

 Permit Modification No.:
 043-11815-00023

Permit Reviewer: Spahi

The Office of Air Management (OAM) has reviewed a modification application from Hitachi Cable Indiana, Inc. relating to the operation of the extrusion, coating, forming, curing and assembly of fluid power hoses and fitting plant.

### **History**

On January 7, 1998, Hitachi Cable Indiana, Inc. submitted an application to the OAM requesting to amend several conditions in their permit. Condition D.3.2 in the permit is being revised because the open top degreaser's solvent to air interface area is less than ten and eight-tenths (10.8) square feet, so only 326 IAC 8-3-3 applies, while 326 IAC 8-3-6 does not apply. Also, Conditions D.3.3, D.3.6 and D.3.7 in the permit are being revised because the solvent to air interface area for the open top degreaser is less than thirteen (13) square feet, so only National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR Part 63.43(b), Subpart T) applies and NESHAP, 326 IAC 14, (40 CFR Part 63.43(c), Subpart T) does not apply. This modification also consists of an alternative method of calculating the daily gas usage for their Johnston Boiler(JB). Finally this modification consists of removing the duct and fan amperage record keeping records for their thermal oxidizer (CE01) because the permittee has already shown compliance with minimum capture efficiency of 90% and minimum destruction efficiency of 95% at the minimum operating temperature of 1,400 °F. Hitachi Cable Indiana, Inc. was issued a Part 70 permit on April 22, 1999.

### **Enforcement Issue**

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and

additional information submitted by the applicant.

An application for the purposes of this review was received on January 26, 2000.

### **Justification for Modification**

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d) because any significant change in existing monitoring terms or conditions shall be considered a significant modification. The following conditions are being amended as follows(changes in bold):

### D.1.5 Monitoring

(a) When operating, the thermal oxidizer, CE01, shall maintain a minimum operating temperature of 1,400EF in order to maintain a minimum 95% destruction efficiency and a minimum capture efficiency of 90%. After a compliance test has been performed as required by Condition D.1.3, the thermal oxidizer, CE01, shall maintain a minimum operating temperature of 1,400EF. and a fan amperage or duct velocity as determined in the compliance test.

### D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with 326 IAC 12 (40 CFR 60.48c (g)). The owner or operator of Johnston Boiler #591.026 shall record and maintain records of the amounts of each fuel combusted during each day.
- (b) An alternative method to calculate the daily fuel consumption for the Johnston Boiler (JB) is:

Total monthly CF or Therms for Building C x estimated percentage of fuel used by the Johnston Boiler (JB) = (Total monthly gas usage for JB)/ Number of JB operating days = Average JB daily gas usage

(**b c**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.3.2 Open Top Vapor Degreaser Operations and Control [326 IAC 8-3-3] [326 IAC 8-3-6]

- (a) The Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip Vapor Degreaser #351.001 with a cover that can be opened and closed easily without disturbing the vapor zone.
  - (2) Equip Vapor Degreaser #351.001 with the following switches:
    - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
    - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
  - (3) Equip Vapor Degreaser #351.001 with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) Equip Vapor Degreaser #351.001 with one (1) of the following control devices:
    - (A) A freeboard ratio of seventy-five hundredths (10.75) or greater and a powered cover if the degreaser opening is greater than one (1) square

meter (ten and eight-tenths (10.8) square feet).

- (B) A refrigerated chiller.
- (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
- (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
- (E) Other systems of demonstrated equivalent or better control as those outlined above. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The Permittee shall ensure that the following operating requirements are met:
  - (1) Keep the cover closed at all times except when processing work loads through the degreaser.
  - (2) Minimize solvent carryout emissions by:
    - (A) Racking articles to allow complete drainage;
    - (B) Moving articles in and out of the degreaser at less than three and threetenths (3.3) meters per minute (eleven (11) feet per minute).
  - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
  - (4) Prohibit the occupation of more than one-half (½) of the degreaser's open top area with the workload.
  - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.
  - (6) Prohibit solvent spraying above the vapor level.
  - (7) Repair solvent leaks immediately, or shut down the degreaser if leaks cannot be repaired immediately.
  - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
  - (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser opening unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration (OSHA) requirements.
  - (10) Prohibit the use workplace fans near the degreaser opening.

- (11) Prohibit visually detectable water in the solvent exiting the water separator.
- (2) Keep the cover closed at all times except when processing workloads through the degreaser.
- (3) Minimize solvent carry out by:
  - (a) racking parts to allow complete drainage.
  - (b) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute).
  - (c) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases.
  - (d) tipping out any pools of solvent on the cleaned parts before removal.
  - (e) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
- (4) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope.
- (5) Not occupy more than half of the degreaser's open top area with the workload.
- (6) Not load the degreaser such that the vapor level drops more than fifty (50%) of the vapor depth when the workload is removed.
- (7) Never spray above the vapor level.
- (8) Repair solvent leaks immediately, or shut down the degreaser.
- (9) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (10) Not use workplace fans near the degreaser opening.
- (11) Not allow visually detectable water in the solvent exiting the water separator.
- (12) Provide a permanent, conspicuous label summarizing the operating requirements.

### D.3.3 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

- (a) Pursuant to 40 CFR 63.463(a) and (b), the Permittee shall conform to the following design requirements:
  - (1) Vapor Degreaser #351.001 shall be designed or operated such that, it has an

- idling and downtime mode cover, as described in 40 CFR63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
- (2) Vapor Degreaser #351.001 shall be employed with a control combination of: working-mode cover, freeboard refrigeration device and dwell ratio of 1.0 and superheated vapor or other equivalent methods of control as determined using the procedure in 40 CFR 63.469.
- (c) Pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:
  - (1) The Permittee shall conduct monitoring of each control device used to comply with 40 CFR 63.463 as provided in 40 CFR 63.466, Monitoring Procedures.
  - (2) Determine during each monitoring period if the control devices listed in D.3.3(a)(2) meet the following requirements:
    - (A) The Permittee shall ensure that the chilled air blanket temperature (in EF), measured at the center of the air blanket of the freeboard refrigeration device is no greater than 30% of the solvent's boiling point.
    - (B A) When using a working-mode cover the Permittee shall:
      - (i) Ensure that the cover opens only for part entrance and removal and completely covers Vapor Degreaser #351.001 openings when closed.
      - (ii) Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
    - (C) When using a dwell the Permittee shall:
      - (i) Determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, as described in 40 CFR63.465.
      - (ii) Ensure that, after cleaning, each part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or for the maximum dwell time determined using the most complex part type or parts basket.
    - (B) When using an idling-mode the Permittee shall:
      - (i) Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine.
      - (ii) Ensure that the idling-mode cover is maintained free of cracks, holes and other defects.
    - (C) When using a superheated vapor the Permittee shall:
      - (i) Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 0F

above the solvent's boiling point.

- (ii) Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed.
- (ii) Ensure that parts remain within the superheated vapor for at least the minimum dwell time.
- (3) An exceedance has occurred if:
  - (A) The requirements of paragraphs,  $\frac{(c)(2)(B)(i), (c)(2)(C)(i),and}{(c)(2)(C)(ii),}$  (c)(2)(A)(i), (c)(2)(B)(i), (c)(2)(C)(ii),and (c)(2)(C)(iii), of this condition are not met; and
  - (B) The requirements of paragraphs (c)(2)(A) and (c)(2)(B)(ii), (c)(2)(A)(ii), (c)(2)(B)(ii) and (c)(2)(C)(i), of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits.
- (4) The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR63.468.

### D.3.6 Monitoring Procedures [326 IAC 2-7-6(1)] [40 CFR 63.466]

Pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures:

- (a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified below:
  - (1) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket of the freeboard refrigeration device, during superheated solvent vapor zone while the solvent cleaning machine is in the idling mode.
- (b) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified below:
  - (1) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers Vapor Degreaser #351.001 openings when closed, and is free of cracks, holes, and other defects.
  - (2) The Permittee shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.

### D.3.7 Recordkeeping Requirements

- (a) The Permittee shall maintain, in written or electronic form, records of the following information specified below, for the life time of the machine,
  - (1) Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.

- (2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that Vapor Degreaser #351.001 and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
- (3) Records of the test required in 40 CFR63.465(d) to determine an appropriate dwell time for each part or parts basket.
- (43) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.

### **County Attainment Status**

The source is located in Floyd County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Moderate Nonattainment
Ozone	Moderate Nonattainment
СО	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and  $NO_x$  emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as nonattainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Floyd County has been classified as nonattainment for VOC and NO<sub>x</sub>. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

### **Source Status**

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	1.012
PM-10	1.012
SO <sub>2</sub>	0.0
VOC	35.7
СО	2.644
NOx	10.4

(4) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and no nonattainment pollutant

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is emitted at a rate of 100 tons per year or more, and it is not one of the 28 listed source categories.

(5) These emissions are based upon past permits issued to this source.

### **Federal Rule Applicability**

- (a) The natural gas fired boiler, Johnston Boiler #591.026, constructed in August 1996, rated at 16.74 MMBtu/hr, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.48c (g)), which states that the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
- (b) The vapor degreaser, Vapor Degreaser #351.001, is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR Part 63, Subpart T) (Halogenated Solvent Cleaning Machine).

The following design requirements for the degreasing operation are applicable:

- (1) Vapor Degreaser #351.001 shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
- (2) Vapor Degreaser #351.001 shall be employed with a control combination of: working-mode cover, freeboard ratio of 1.0 and superheated vapor or other equivalent methods of control as determined using the procedure in 40 CFR 63.469.
- (6) A freeboard ratio of 0.75 or greater shall be maintained.
- (4) An automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts shall be installed.
- (5) The degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
- (6) The degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (7) The degreaser shall have a primary condenser.
- (8) A combination of controls, including a freeboard refrigeration device, dwell and a working-mode cover shall be used.
- (9) Monitoring shall be conducted of each control device used.

The following operational practices for the degreasing operation are applicable:

- (1) Parts baskets or the parts being cleaned in the degreaser shall not occupy more than fifty percent (50%) of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
- (2) Any spraying operations shall be done within the vapor zone or within a section of the

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solvent cleaning machine that is not directly exposed to the ambient air.

- (3) Parts shall be oriented so that the solvent drains from them freely. Parts with holes may need to be tipped or rotated before being removed.
- (4) Parts or baskets shall not be removed from any solvent cleaning machine before dripping has stopped.
- (5) During startup the primary condenser shall be turned on before the sump heater.
- (6) During shutdown the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (7) When solvent is added or drained, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (8) The machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or by EPA approved alternative methods.
- (9) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of Subpart T, if requested during an inspection.
- (10) Waste solvent ,still bottoms, and sump bottoms shall be collected and stored in closed containers that may contain a pressure relief device.
- (11) Sponges, fabric, wood, and paper products shall not be cleaned.

### State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (General Reduction Requirements for New Facilities)

Pursuant to CP No. 043-4741-00023, issued on December 20, 1995, the thermal oxidizer, CE01, shall operate at all times when Glue Applicator Extruder #73.001 and Glue Applicator Extruder #73.002 are in operation. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,400EF to maintain a minimum 95% destruction of volatile organic compound (VOC), and a minimum capture efficiency of 90%. This will satisfy the BACT requirements under 326 IAC 8-1-6.

326 IAC 8-3-3 (Open Top Vapor Degreaser Operations)

The vapor degreaser, Vapor Degreaser #351.001 is an open top degreaser and it was constructed after January 1, 1980. Therefore, 326 IAC 8-3-3 is applicable. The Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip Vapor Degreaser #351.001 with a cover that can be opened and closed easily without disturbing the vapor zone.
- (2) Keep the cover closed at all times except when processing workloads through the degreaser.
- (3) Minimize solvent carry out by:

- (a) racking parts to allow complete drainage.
- (b) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute).
- (c) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases.
- (d) tipping out any pools of solvent on the cleaned parts before removal.
- (e) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
- (4) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope.
- (5) Not occupy more than half of the degreaser's open top area with the workload.
- (6) Not load the degreaser such that the vapor level drops more than fifty (50%) of the vapor depth when the workload is removed.
- (7) Never spray above the vapor level.
- (8) Repair solvent leaks immediately, or shut down the degreaser.
- (9) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (10) Not use workplace fans near the degreaser opening.
- (11) Not allow visually detectable water in the solvent exiting the water separator.
- (12) Provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-6 (Open Top Vapor Degreaser Operations and Control Requirements)

The vapor degreaser, Vapor Degreaser #351.001 is an open top degreaser that has an air to solvent interface of 4.4 square feet, which is less than ten and eight-tenths (10.8) square feet for this rule to be applicable. The source is located in Floyd County. Therefore, 326 IAC 8-3-6 does not apply.

### Conclusion

The operation of this the extrusion, coating, forming, curing and assembly of fluid power hoses and fitting plant shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 043-11815-00023.